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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.<sup>1</sup>

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Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**NOTICE OF ADJOURNMENT OF HEARING ON PRIVILEGE DISPUTES**

**PLEASE TAKE NOTICE** that, on September 30, 2020, the Official Committee of Unsecured Creditors (the “Official Committee”) appointed in the chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Official Committee of Unsecured Creditors’ Motion to Compel Production of Purportedly Privileged Documents, or for In Camera Review, Based on Failure of the Sacklers and the Debtors*

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014).

*to Demonstrate Documents Identified on Logs Are Privileged* [ECF No. 1752] (the “Challenges Motion”) and the *Official Committee of Unsecured Creditors’ Motion to Compel Production of Purportedly Privileged Documents, or for In Camera Review, Based on Good Cause, Crime Fraud, and at Issue Exceptions to Claims of Privilege* [ECF No. 1753] (the “Exceptions Motion”) and, together with the Challenges Motion, the “Privilege Motions”), seeking orders of the Court compelling the Debtors, on the one hand, and the Sacklers,<sup>2</sup> on the other hand, to produce to the Official Committee certain documents with respect to which the Debtors and the Sacklers were asserting claims of privilege.

**PLEASE TAKE FURTHER NOTICE** that, on October 15, 2020, the Debtors filed the *Debtors’ Omnibus Objection to the Official Committee’s Motions to Compel Production of the Debtors’ Privileged Documents and Cross-Motion for a Protective Order* [ECF No. 1808] (the “Cross-Motion”). Between October 14, 2020 and October 15, 2020, the Sacklers filed objections to the Privilege Motions (the “Objections”).<sup>3</sup>

**PLEASE TAKE FURTHER NOTICE** that, on November 6, 2020, the parties agreed to a briefing schedule set forth in the *Notice of Agreement Between the Debtors and Official Committee of Unsecured Creditors Regarding Privilege Motions and Adjournment of Hearing*

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<sup>2</sup> As used herein, the term “Sacklers” refers collectively to the Raymond Custodians and the M-ICSPs, as defined in the *Amended Stipulation and Agreed Order Regarding Discovery Deadlines and Briefing Scheduling in the Chapter 11 Cases* [ECF No. 1734].

<sup>3</sup> The Objections are: (i) *Objection of Mortimer Sackler Initial Covered Sackler Persons to the Official Committee of Unsecured Creditors’ Motion to Compel Production of Purportedly Privileged Documents, or for In Camera Review, Based on Good Cause, Crime Fraud, and at Issue Exceptions to Claims of Privileged* [ECF No. 1804]; (ii) *Objection of Mortimer Sackler Initial Covered Sackler Persons to the Official Committee of Unsecured Creditors’ Motion to Compel Production of Purportedly Privileged Documents or for In Camera Review, Based on Failure of the Sacklers and the Debtors to Demonstrate Documents Identified on Logs Are Privileged* [ECF No. 1806]; (iii) *The Raymond Sackler Family’s Opposition to the Official Committee of Unsecured Creditors’ General Challenges Motion* [ECF No. 1810]; and (iv) *The Raymond Sackler Family’s Opposition to the Official Committee of Unsecured Creditors’ Exceptions Motion* [ECF No. 1811].

*with Respect to Remaining Privilege Disputes as to the Sacklers* [ECF No. 1908] (the “Briefing Schedule”).

**PLEASE TAKE FURTHER NOTICE** that, on November 15, 2020, the Official Committee and Debtors filed the *Stipulation of Settlement and Agreed Order Regarding Official Committee’s Motions to Compel and Debtors’ Motion for Protective Order* [ECF No. 1955], resolving the relief sought in the Privilege Motions as to the Debtors and the relief sought by the Debtors in the Cross-Motion.

**PLEASE TAKE FURTHER NOTICE** that, on November 18, 2020, pursuant to the Briefing Schedule, the Official Committee filed replies in support of the Privilege Motions (the “Replies”),<sup>4</sup> and the Ad Hoc Group of Non-Consenting States filed a statement in support of the Privilege Motions (the “Statement”).<sup>5</sup>

**PLEASE TAKE FURTHER NOTICE** that, on December 9, 2020, pursuant to the Briefing Schedule, the Sacklers filed sur-replies regarding the Privilege Motions (the “Sur-replies”).<sup>6</sup>

**PLEASE TAKE FURTHER NOTICE** that, on December 9, 2020, pursuant to an agreement among the parties, the Official Committee filed a *Notice of Adjournment of Hearing on*

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<sup>4</sup> The Replies are: (i) *Official Committee of Unsecured Creditors’ Reply in Support of Motion to Compel Production of Purportedly Privileged Documents, or for In Camera Review, Based on Failure of the Sacklers to Demonstrate Documents Identified on Logs are Privileged* [ECF No. 2013], and (ii) *Official Committee of Unsecured Creditors’ Reply in Support of its Motion to Compel Production of Purportedly Privileged Documents, or for In Camera Review, Based on Good Cause, Crime Fraud, and at Issue Exceptions to Claims of Privilege* [ECF No. 2014].

<sup>5</sup> The Statement is *The Ad Hoc Group of Non-Consenting States’ Statement in Support of the Official Committee of Unsecured Creditors’ Motions to Compel Production of Purportedly Privileged Documents or for In Camera Review* [ECF No. 2012].

<sup>6</sup> The Sur-replies are: (i) *Sur-reply Memorandum of Objection of Mortimer Sackler Initial Covered Sackler Persons to the Official Committee of Unsecured Creditors’ Motion to Compel Production of Purportedly Privileged Documents, or for In Camera Review, Based on Good Cause, Crime Fraud, and At Issue Exceptions to Claims of Privilege* [ECF No. 2095], and (ii) *The Raymond Sackler Family’s Surreply in Further Support of its Opposition to the Official Committee of Unsecured Creditors’ Exceptions Motion* [ECF No. 2093].

*Privilege Disputes* [ECF No. 2092], adjourning the hearing with regard to the Privilege Motions from December 15, 2020 to December 22, 2020.

**PLEASE TAKE FURTHER NOTICE** that, on December 17, 2020, pursuant to an agreement among the parties, the Official Committee filed a second *Notice of Adjournment of Hearing on Privilege Disputes* [ECF No. 2153], adjourning the hearing with regard to the Privilege Motions from December 22, 2020 to January 20, 2021.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to an agreement among the parties, the hearing with regard to the Privilege Motions, but solely as it relates to the remaining disputes as between the Official Committee and the Sacklers, which previously had been scheduled for January 20, 2021, shall be adjourned to a date no earlier than **March 1, 2021**.

**PLEASE TAKE FURTHER NOTICE** that the sole portion of the omnibus hearing scheduled for January 20, 2021 at 10:00 a.m. (prevailing Eastern Time) (the “Hearing”) that was scheduled to be conducted over Zoom was the portion that related to the Privilege Motions, and that all matters that remain scheduled for the Hearing will be heard telephonically pursuant to General Order M-543, dated March 20, 2020 (Morris, C.J.) (Bankr. S.D.N.Y. Mar. 20, 2020) via Court Solutions. Parties wishing to appear at, or attend, the Hearing must refer to and comply with the Bankruptcy Court’s guidelines for telephonic appearances and make arrangements with Court Solutions LLC by telephone at (917) 746-7476.

Dated: New York, New York  
January 19, 2021

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